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REGULATORY AUTH.

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EX-100-11-SECRETARY

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April 14, 2000

**By Hand**

David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Proceeding to Establish "Permanent Prices" for Interconnection and Unbundled  
Network Elements*  
**Docket No. 97-01262**

Dear Mr. Waddell:

Pursuant to the request issued by the Authority on April 10, 2000, enclosed is the original and thirteen copies of AT&T's proposal for "deaveraging" the proxy UNE prices established by the Arbitrators in Docket Nos. 96-01152 and 96-01271 (the "AT&T and MCI arbitrations").

If you have questions, please call me.

Sincerely,

  
Jim Lamoureux

Encls.

cc: Counsel for all Parties of Record (w/encls.)

POSTED  
4-17-00

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

In Re: Petition to Convene A Contested )  
Case Proceeding to Establish Permanent )  
Prices for Interconnection and Unbundled )  
Elements )

Docket No. 97-01262

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**AT&T'S PROPOSAL TO DEAVERAGE PROXY UNE PRICES**

Pursuant to the request issued by the Authority on April 10, 2000, AT&T Communications of the South Central States, Inc. ("AT&T") submits its proposal for "deaveraging" the proxy UNE prices established by the Arbitrators in Docket Nos. 96-01152 and 96-01271 (the "AT&T and MCI arbitrations").

All UNE prices, averaged and deaveraged, must adhere to the general UNE pricing standards set forth by the FCC in 47 C.F.R. § 51.503 and the forward-looking economic cost standards set forth by the FCC in 47 C.F.R. § 51.505. Moreover, as the Authority indicates in its April 10<sup>th</sup> request, the FCC has announced that its stay of 47 C.F.R. § 51.507(f) (the FCC's "deaveraging rule") will be lifted on May 2, 2000. The FCC's deaveraging rule requires that UNE prices must be deaveraged "in at least three defined geographic areas within the state to reflect geographic cost differences." 47 C.F.R. § 51.507(f).

The FCC's deaveraging rule and its rules governing UNE prices require that the only relevant considerations in determining geographically deaveraged UNE prices are the forward looking economic cost differences associated with different geographic areas. Simply put, assuming an average UNE price is cost-based to begin with, if something other than forward looking economic cost is used to deaverage that average price, the resulting deaveraged prices will no longer be cost based, which would violate §§ 51.503 and 51.505 of the FCC's rules. Thus, deaveraged UNE prices must reflect the relative

forward looking economic cost differences of the UNEs between geographic areas.

In order to comply with the FCC's UNE pricing rules, AT&T recommends that the cost differences of at least three geographic areas be determined by evaluating BellSouth's loop costs by wire center. These cost differences should be applied to the current average loop proxy prices to determine interim deaveraged loop prices. Wire centers with similar cost characteristics should be grouped together to create a minimum of three zones.

The process for calculating the appropriate prices using this methodology is relatively straightforward. BellSouth's stand alone average loop proxy prices adopted in the AT&T and MCI arbitrations were developed from an early paper version of BellSouth's loop cost model. BellSouth's loop cost model determines BellSouth's "average" loop cost by using a statistical sample of loops in Tennessee. It does not, however, provide the information necessary to determine costs that reflect geographic cost differences.<sup>1</sup> On the other hand, the Hatfield Model proposed in Docket No. 97-01262 does provide the information necessary to determine costs that reflect geographic differences. Thus, even though the Arbitrators did not adopt the rates produced by the Hatfield Model, the costs per wire center as determined by the Hatfield Model can still be used to "deaverage" the proxy prices adopted by the Arbitrators.

Deaveraging the loop proxy prices adopted by the Arbitrators can be accomplished by: (1) ranking BellSouth's wire centers in order of lowest cost to highest cost as determined by the HAI Model, (2) placing all wire centers that have an average loop cost of between 0 and 100% of BellSouth's statewide average loop cost in Zone 1, (3) placing all wire centers that have an average loop cost of between 100 and 200% in Zone 2, and (4)

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<sup>1</sup> As stated by D. Daonne Caldwell, Direct Testimony on Behalf of BellSouth before the Florida Public Service Commission, Docket No. 990649-TP, August 11, 1999, p. 10, "However, the sample approach did have inherent limitations. First, the sample was statistically valid only for the services tested, i.e., only for single line residential and business loops and only on a statewide average basis. Any attempt to stratify the sample into geographic areas for geographic deaveraging could not be statistically supported."

placing all wire centers that have an average loop cost of over 200% in Zone 3. Then, for each zone, (1) the average wire center cost in the zone is calculated, (2) the average wire center cost for each zone is divided by the total statewide average loop cost to arrive at a percentage for each zone, and (3) those percentages are multiplied by the average loop proxy price to determine the “deaveraged” loop proxy price for each zone.

As an illustration, assume the Hatfield Model is run for Tennessee, and the wire centers are ranked from lowest to highest based on the average loop cost per wire center. Assume that the average statewide loop cost calculated by the Hatfield Model for Tennessee is \$21.38. Zone 1 would then consist of all the BellSouth wire centers in Tennessee with an average loop cost of \$21.38 or less. Assume then that average loop cost per wire center in zone 1 is \$15.91. The percentage for zone 1 would then be  $15.91/21.38 = 74.42\%$ . The average 2 wire loop price from the AT&T and MCI arbitration for a 2 wire loop is \$18.00, and the “deaveraged” proxy loop price for a 2 wire loop in zone 1 would then be  $.7442 \times 18.00 = \$13.39$ .

Seventeen parties, including AT&T and BellSouth agreed to this process as an interim method to deaverage existing statewide average UNE prices in Florida and entered into a stipulated agreement. This deaveraging stipulation was adopted by the Florida Public Service Commission. AT&T would be willing to accept this process in Tennessee as an interim deaveraging solution for the UNE proxy prices in order to meet the FCC’s May 2, 2000 deadline.<sup>2</sup> Attachment 1 contains AT&T’s proposed proxy UNE loop prices using this process, and Attachment 2 contains the supporting data demonstrating how the process applies the Hatfield Model wire center cost information to determine the zones and the

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<sup>2</sup> AT&T does not concede that the current average UNE proxy prices in Tennessee are cost based or that any “deaveraged” prices that are based on the current average UNE proxy prices would be cost based under the FCC’s rules. It is incumbent on the TRA to determine permanent cost-based TELRIC UNE prices, including cost-based TELRIC deaveraged loop prices, in Docket No. 97-01262 in order to establish cost-based TELRIC UNE prices in compliance with the FCC’s UNE pricing rules.

percentages for each zone. Consistent with the FCC's UNE pricing standards and deaveraging rule, AT&T recommends that the TRA adopt AT&T's proposed geographic deaveraging process and resulting "deaveraged" proxy loop prices.

Based on proceedings in other states, AT&T anticipates that BellSouth will propose to deaverage the Tennessee proxy loop prices by grouping together its Tennessee wire centers by rate group rather than cost and then determining the average cost of wire centers that have the same retail prices. BellSouth's proposal to deaverage loop prices through the use of the average cost of wire centers that have the same retail cost is a violation of FCC rules.

By first grouping wire centers together by rate group, BellSouth's deaveraging methodology inappropriately raises the loop prices where its retail rates are high. BellSouth takes all the wire centers that serve areas in their rate groups with the highest retail rates in the state and groups all of them together into one zone. Thus, BellSouth's methodology places both low cost and high cost wire centers in the same zones, and is not cost-based. By using rate groups to lump together low and high cost wire centers in the same zone, BellSouth raises the average cost of that zone, and that raises the deaveraged loop prices for that zone. The resulting higher than cost-based deaveraged loop prices insulate BellSouth's high retail rates in low cost areas from loop based local competition.

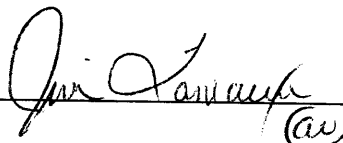
BellSouth's proposal also violates the FCC's UNE pricing rules. 47 C.F.R. §§ 51-503 require that BellSouth's UNE prices be based on forward looking economic cost. BellSouth's retail rate groups are not based on forward looking economic cost. Therefore, BellSouth's proposal to deaverage loop prices based on its current rate groups violates 47 C.F.R. §§ 51-503, because it does not result in forward looking economic cost-based deaveraged loop prices. Additionally, 47 C.F.R. § 51.505(d) states

that the revenues of other services cannot be considered in the development of a UNE price. BellSouth's proposal violates 47 C.F.R. § 51.505(d) by considering the revenues included in the services of its rate groups in the development of its deaveraged loop prices.

### CONCLUSION

The TRA should adopt the methodology recommended by AT&T and the resulting deaveraged proxy loop prices set forth in Attachment 1 hereto.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jim Lamoureux", is written over a horizontal line. To the right of the signature, there is a small circular mark containing the letters "aw".

Jim Lamoureux  
AT&T Communications of the South  
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Attorney for AT&T Communications of the  
South Central States, Inc.

April 14, 2000

# AT&T Proposal to Deaverage Proxy UNE Loop Prices

Attachment 1  
TN Docket No. 97-01262

	Avg monthly cost per zone	Total lines	Avg monthly cost per line	Ratio to Overall Cost
Total	\$56,204,035.29	2,629,118	\$21.38	
zone 1	\$26,198,402.10	1,646,830.65	\$15.91	74.42% Wirecenters at 0-100% Ratio to Overall Cost
zone 2	\$25,537,156.63	892,312.56	\$28.62	133.87% Wirecenters at 100-200% Ratio to Overall Cost
zone 3	\$4,468,476.57	89,675.79	\$49.83	233.09% Wirecenters at >200% Ratio to Overall Cost

## Prices from Docket No. 97-01262

	2-w VG	4-w VG	2-w ISDN
Average	\$ 18.00	\$ 18.00	\$ 18.00
zone 1	\$ 13.39	\$ 13.39	\$ 13.39
zone 2	\$ 24.10	\$ 24.10	\$ 24.10
zone 3	\$ 41.96	\$ 41.96	\$ 41.96

**AT&T Proposal to Deaverage  
Proxy UNE Loop Prices**

Attachment 2  
TN Docket No. 97-01262

cli	Avg monthly cost per line	Total lines	Ratio to Overall Cost	Avg monthly cost per cli	Zone assignment
MMPHTNMA	\$ 10.86	47,313	50.78%	\$ 513,649	1
NSVLTNUN	\$ 10.98	29,294	51.38%	\$ 321,764	1
CHTGTNNS	\$ 12.14	35,305	56.77%	\$ 428,539	1
NSVLTNMT	\$ 12.27	69,663	57.40%	\$ 854,937	1
MMPHTNMT	\$ 13.21	41,747	61.81%	\$ 551,658	1
MMPHTNEL	\$ 13.85	57,077	64.76%	\$ 790,309	1
MMPHTNSL	\$ 13.91	46,526	65.07%	\$ 647,314	1
NSVLTNAA	\$ 13.96	11,206	65.28%	\$ 156,414	1
NSVLTNST	\$ 14.01	51,909	65.53%	\$ 727,305	1
MMPHTNHP	\$ 14.24	13,982	66.61%	\$ 199,124	1
NSVLTNCH	\$ 14.37	47,325	67.23%	\$ 680,254	1
KNVLTNBE	\$ 14.40	28,163	67.33%	\$ 405,430	1
NSVLTNAP	\$ 14.51	20,910	67.86%	\$ 303,359	1
MMPHTNCK	\$ 14.51	15,959	67.87%	\$ 231,586	1
MMPHTNOA	\$ 14.52	100,359	67.90%	\$ 1,456,954	1
MMPHTNST	\$ 14.71	31,366	68.81%	\$ 461,470	1
MMPHTNCT	\$ 14.85	56,100	69.46%	\$ 833,111	1
NSVLTNMC	\$ 15.02	24,788	70.25%	\$ 372,323	1
NSVLTNCD	\$ 15.02	3,207	70.26%	\$ 48,180	1
CHTGTNDT	\$ 15.02	39,457	70.27%	\$ 592,822	1
NSVLTNIN	\$ 15.74	36,253	73.62%	\$ 570,603	1
NSVLTNDO	\$ 15.88	39,711	74.27%	\$ 630,581	1
KNVLTNMA	\$ 15.93	75,439	74.49%	\$ 1,201,503	1
MMPHTNBA	\$ 15.96	80,454	74.64%	\$ 1,283,914	1
CHTGTNBR	\$ 16.04	49,058	75.03%	\$ 786,932	1
CHTGTNRB	\$ 16.18	26,636	75.70%	\$ 431,096	1
GTWSTNSW	\$ 16.21	9,542	75.83%	\$ 154,705	1
NSVLTNHH	\$ 16.42	24,659	76.80%	\$ 404,916	1
MMPHTNGT	\$ 16.48	43,329	77.09%	\$ 714,169	1
NSVLTNWM	\$ 16.88	23,139	78.97%	\$ 390,697	1
CHTGTNRO	\$ 16.91	6,715	79.11%	\$ 113,579	1
JCSNTNNS	\$ 17.07	19,909	79.85%	\$ 339,894	1
OKRGTNMT	\$ 17.19	25,459	80.41%	\$ 437,682	1
KNVLTNWH	\$ 17.26	48,684	80.74%	\$ 840,375	1
MMPHTNFR	\$ 17.46	25,832	81.65%	\$ 450,914	1
OLHCTNMA	\$ 18.01	5,976	84.22%	\$ 107,603	1
NSVLTNBW	\$ 18.12	23,516	84.77%	\$ 426,198	1
NSVLTNBV	\$ 18.33	14,751	85.72%	\$ 270,350	1
MMPHTNWW	\$ 18.48	14,841	86.41%	\$ 274,191	1
HDVLTNMA	\$ 18.91	25,302	88.46%	\$ 478,534	1
KNVLTNFC	\$ 19.60	34,470	91.66%	\$ 675,472	1
MAVLTNMA	\$ 20.56	49,251	96.15%	\$ 1,012,413	1
CHTGTNMV	\$ 20.64	14,016	96.56%	\$ 289,356	1
MRTWTNMA	\$ 20.80	31,373	97.28%	\$ 652,474	1
GDVLTNMA	\$ 20.86	15,341	97.55%	\$ 319,951	1
NSVLTNBH	\$ 21.06	1,876	98.49%	\$ 39,512	1
CLVLTNMA	\$ 21.09	53,602	98.66%	\$ 1,130,693	1
CLTNTNMA	\$ 21.21	12,436	99.19%	\$ 263,729	1
CHTGTNSE	\$ 21.26	8,076	99.44%	\$ 171,694	1



**AT&T Proposal to Deaverage  
Proxy UNE Loop Prices**

Attachment 2  
TN Docket No. 97-01262

cli	Avg monthly cost per line	Total lines	Ratio to Overall Cost	Avg monthly cost per cli	Zone assignment
KNVLTNYH	\$ 21.34	27,368	99.79%	\$ 583,922	1
FKLNTNCC	\$ 21.36	8,159	99.89%	\$ 174,250	1

# AT&T Proposal to Deaverage Proxy UNE Loop Prices

Attachment 2  
TN Docket No. 97-01262

cli	Avg monthly cost per line	Total lines	Ratio to Overall Cost	Avg monthly cost per cli	Zone assignment
CRVLTNMA	\$ 21.92	15,118	102.50%	\$ 331,312	2
SMYRTNMA	\$ 22.04	18,349	103.09%	\$ 404,425	2
CHTGTNSM	\$ 22.20	7,175	103.83%	\$ 159,285	2
MRBOTNMA	\$ 22.36	53,589	104.61%	\$ 1,198,518	2
CLEVTNMA	\$ 22.42	46,558	104.88%	\$ 1,044,031	2
GALLTNMA	\$ 22.60	18,332	105.71%	\$ 414,327	2
CLMATNMA	\$ 22.65	27,295	105.92%	\$ 618,133	2
SHVLTNMA	\$ 22.74	14,250	106.38%	\$ 324,098	2
JCSNTNMA	\$ 22.99	34,341	107.54%	\$ 789,581	2
LWBGTNMA	\$ 23.10	12,196	108.05%	\$ 281,728	2
DYBGTNMA	\$ 23.64	16,831	110.56%	\$ 397,852	2
TLLHTNMA	\$ 23.86	15,156	111.61%	\$ 361,647	2
SPFDTNMA	\$ 23.87	12,829	111.65%	\$ 306,242	2
HMBLTNMA	\$ 24.73	8,596	115.68%	\$ 212,591	2
LNCYTNMA	\$ 24.82	12,224	116.10%	\$ 303,407	2
JFCYTNMA	\$ 25.65	8,917	119.99%	\$ 228,755	2
MILNTNMA	\$ 25.77	7,060	120.54%	\$ 181,933	2
HIMNTNMA	\$ 25.90	7,514	121.15%	\$ 194,616	2
UNCYTNMA	\$ 26.05	10,012	121.86%	\$ 260,828	2
NSVLTNWC	\$ 26.06	10,098	121.89%	\$ 263,151	2
FKLNTNMA	\$ 26.19	27,673	122.52%	\$ 724,894	2
GTBGTNMT	\$ 26.44	5,891	123.68%	\$ 155,766	2
ATHNTNMA	\$ 26.60	17,020	124.41%	\$ 452,706	2
DKSNTNMT	\$ 27.49	14,651	128.58%	\$ 402,778	2
SVVLTNMT	\$ 27.63	24,358	129.24%	\$ 673,069	2
MNPLTNMA	\$ 27.77	3,013	129.90%	\$ 83,688	2
LBNNTNMA	\$ 27.92	23,944	130.57%	\$ 668,410	2
CRHTNMA	\$ 27.94	3,760	130.68%	\$ 105,046	2
WHHSTNMA	\$ 28.11	4,603	131.48%	\$ 129,402	2
LFLTNTMA	\$ 28.22	12,812	131.99%	\$ 361,553	2
TRTNTNMA	\$ 28.68	5,232	134.15%	\$ 150,051	2
MCKNTNMA	\$ 28.72	4,360	134.32%	\$ 125,209	2
PARSTNMA	\$ 28.79	13,019	134.67%	\$ 374,861	2
MNCHTNMA	\$ 29.19	10,262	136.55%	\$ 299,575	2
FYVLTNMA	\$ 29.29	11,020	137.01%	\$ 322,801	2
GNBRTNMA	\$ 29.63	3,515	138.60%	\$ 104,155	2
WNCHTNMA	\$ 30.01	12,331	140.34%	\$ 369,981	2
SWTWTNMT	\$ 30.05	5,292	140.57%	\$ 159,061	2
CHTGTNHT	\$ 30.19	7,901	141.18%	\$ 238,505	2
RKWDTNMA	\$ 30.36	6,558	142.02%	\$ 199,129	2
LRBGTNMA	\$ 30.92	13,377	144.63%	\$ 413,647	2
NWPTTNMT	\$ 30.98	13,572	144.90%	\$ 420,443	2
CVTNTNMT	\$ 31.16	12,662	145.75%	\$ 394,573	2
PTLDTNMA	\$ 31.19	8,711	145.88%	\$ 271,702	2
LODNTNMA	\$ 31.22	6,136	146.04%	\$ 191,591	2
KGTNTNMT	\$ 31.23	8,395	146.08%	\$ 262,208	2
ASCYTNMA	\$ 31.70	7,876	148.28%	\$ 249,694	2
SDDSTNMA	\$ 31.90	7,699	149.19%	\$ 245,562	2
ETWHTNMT	\$ 32.20	4,946	150.61%	\$ 159,253	2

# **AT&T Proposal to Deaverage Proxy UNE Loop Prices**

Attachment 2  
TN Docket No. 97-01262

cli	Avg monthly cost per line	Total lines	Ratio to Overall Cost	Avg monthly cost per cli	Zone assignment
OLSPTNMA	\$ 32.38	5,430	151.45%	\$ 175,841	2
DYTNMA	\$ 32.41	10,688	151.59%	\$ 346,411	2
WHPITNMA	\$ 32.46	3,040	151.83%	\$ 98,692	2
RPLYTNMA	\$ 32.51	7,292	152.04%	\$ 237,022	2
RRVLTNMA	\$ 32.74	8,798	153.13%	\$ 288,055	2
TPVLTNMA	\$ 32.79	1,825	153.37%	\$ 59,838	2
LKCYTNMA	\$ 32.92	3,887	153.99%	\$ 127,974	2
MDVITNMT	\$ 33.67	6,447	157.47%	\$ 217,063	2
BWVLTNMA	\$ 33.90	9,375	158.55%	\$ 317,771	2
MSCTTNMT	\$ 34.23	10,265	160.11%	\$ 351,399	2
HHNWTNMA	\$ 34.37	6,029	160.75%	\$ 207,213	2
NWBRTNMA	\$ 34.52	3,286	161.44%	\$ 113,414	2
SPBGTNMA	\$ 34.66	4,017	162.10%	\$ 139,218	2
SPHLTNMT	\$ 34.87	2,658	163.11%	\$ 92,686	2
MEDNTNMA	\$ 35.35	1,290	165.36%	\$ 45,601	2
HTVLTNMA	\$ 35.40	3,200	165.57%	\$ 113,272	2
LXTNTNMA	\$ 35.48	11,674	165.97%	\$ 414,224	2
DNRGTNMA	\$ 35.55	5,936	166.27%	\$ 211,023	2
KNTNTNMA	\$ 35.59	1,022	166.48%	\$ 36,368	2
FRVWTNMT	\$ 35.73	3,886	167.13%	\$ 138,868	2
PLSKTNMA	\$ 35.89	13,405	167.87%	\$ 481,120	2
MYVLTNMA	\$ 36.14	5,477	169.06%	\$ 197,949	2
BLVRTNMA	\$ 36.16	6,815	169.12%	\$ 246,418	2
WHBLTNMT	\$ 36.54	4,976	170.89%	\$ 181,796	2
DYERTNMT	\$ 36.59	2,052	171.15%	\$ 75,075	2
SVNHTNMT	\$ 36.60	9,759	171.21%	\$ 357,214	2
SANGTNMT	\$ 36.71	2,733	171.70%	\$ 100,319	2
HNSNTNMT	\$ 37.09	6,727	173.46%	\$ 249,473	2
ARTNTNMT	\$ 37.11	5,995	173.59%	\$ 222,508	2
GNFDTNMT	\$ 37.52	1,893	175.49%	\$ 71,032	2
HLLSTNMT	\$ 37.69	2,571	176.28%	\$ 96,890	2
CHTNTNMT	\$ 37.81	2,145	176.83%	\$ 81,105	2
FIVLTNMA	\$ 37.82	1,896	176.88%	\$ 71,709	2
NRRSTNMA	\$ 38.13	3,340	178.35%	\$ 127,376	2
SLMRTNMT	\$ 38.55	6,102	180.33%	\$ 235,253	2
RDGLTNMA	\$ 38.99	1,256	182.36%	\$ 48,973	2
CMDNTNMA	\$ 39.11	7,050	182.94%	\$ 275,721	2
WHWLTNMA	\$ 40.05	2,938	187.33%	\$ 117,654	2
CLDGTNMA	\$ 40.15	5,021	187.80%	\$ 201,585	2
BLLSTNMA	\$ 40.58	1,350	189.80%	\$ 54,762	2
GLSNTNMA	\$ 40.64	2,086	190.10%	\$ 84,797	2
JSPRTNMT	\$ 40.65	4,799	190.13%	\$ 195,061	2
HNTGTNMA	\$ 41.42	6,163	193.75%	\$ 255,280	2
PSVWTNMT	\$ 41.49	3,937	194.04%	\$ 163,333	2
CHRLTNMT	\$ 42.16	2,094	197.22%	\$ 88,274	2
SPCYTNMT	\$ 42.36	4,633	198.15%	\$ 196,276	2
WVRLTNMT	\$ 42.66	5,250	199.53%	\$ 223,968	2
CRPLTNMA	\$ 42.67	2,777	199.59%	\$ 118,508	2

# **AT&T Proposal to Deaverage Proxy UNE Loop Prices**

Attachment 2  
TN Docket No. 97-01262

cli	Avg monthly cost per line	Total lines	Ratio to Overall Cost	Avg monthly cost per cli	Zone assignment
JLLCTNMA	\$ 42.83	3,068	200.35%	\$ 131,403	3
TRINTNMA	\$ 43.69	866	204.34%	\$ 37,851	3
MCWNTNMT	\$ 43.81	2,125	204.90%	\$ 93,102	3
TWNSTNMA	\$ 43.84	1,538	205.04%	\$ 67,442	3
WTTWTNMA	\$ 44.11	1,658	206.33%	\$ 73,153	3
BLGPTNMA	\$ 44.31	5,092	207.24%	\$ 225,619	3
GRNBTNMA	\$ 44.98	4,612	210.39%	\$ 207,447	3
TROYTNMT	\$ 45.78	2,832	214.12%	\$ 129,661	3
WHVLTNMT	\$ 46.09	1,253	215.57%	\$ 57,757	3
LYLSTNMA	\$ 46.11	3,170	215.66%	\$ 146,161	3
HNLDTNMA	\$ 46.44	1,282	217.22%	\$ 59,529	3
BNTNTNMT	\$ 46.75	2,530	218.67%	\$ 118,268	3
CNVLTNMA	\$ 47.00	5,630	219.84%	\$ 264,606	3
CNHMTNMA	\$ 47.13	2,260	220.43%	\$ 106,522	3
SOVLTNMT	\$ 47.30	6,768	221.23%	\$ 320,102	3
FRDNTNMA	\$ 47.55	1,368	222.39%	\$ 65,040	3
EAVLTNMA	\$ 47.67	1,144	222.98%	\$ 54,522	3
FLVLTNMA	\$ 47.80	2,170	223.57%	\$ 103,711	3
DOVRTNMT	\$ 47.84	4,789	223.77%	\$ 229,111	3
BGSNTNMA	\$ 48.24	1,248	225.64%	\$ 60,213	3
SRVLTNMA	\$ 48.58	1,858	227.23%	\$ 90,248	3
CULKTNMA	\$ 49.45	1,087	231.28%	\$ 53,736	3
SEWNTNMW	\$ 51.20	1,378	239.48%	\$ 70,537	3
MDTNTNMA	\$ 51.59	1,820	241.29%	\$ 93,874	3
GBSNTNMT	\$ 51.59	548	241.31%	\$ 28,255	3
CRHLTNCB	\$ 52.36	1,978	244.92%	\$ 103,561	3
SMTWTNMA	\$ 52.76	1,265	246.76%	\$ 66,735	3
WTRRTNMT	\$ 52.78	1,863	246.88%	\$ 98,309	3
BTSPNTNMA	\$ 53.38	1,459	249.66%	\$ 77,866	3
WLPTTNMA	\$ 53.40	1,000	249.77%	\$ 53,413	3
PTBGTNMA	\$ 53.99	526	252.55%	\$ 28,410	3
DCTRNTNMT	\$ 54.43	1,508	254.61%	\$ 82,112	3
ACHLTNMT	\$ 55.40	1,320	259.14%	\$ 73,140	3
BLNCTNMT	\$ 56.57	1,602	264.62%	\$ 90,620	3
HRNBNTNMT	\$ 57.02	1,633	266.68%	\$ 93,079	3
SNTFTNMA	\$ 57.37	771	268.33%	\$ 44,205	3
CMCYTNMT	\$ 57.38	354	268.36%	\$ 20,332	3
MSCWTNMA	\$ 58.24	1,435	272.38%	\$ 83,561	3
LYBGTNMT	\$ 58.40	1,092	273.14%	\$ 63,767	3
VNLRTNMA	\$ 58.78	1,293	274.93%	\$ 76,014	3
HNNGTNMA	\$ 60.20	1,405	281.59%	\$ 84,568	3
SNVLTNMA	\$ 60.81	2,099	284.42%	\$ 127,633	3
HRFRTNMA	\$ 62.08	1,882	290.36%	\$ 116,844	3
GDJTTNMA	\$ 62.46	1,537	292.12%	\$ 95,991	3
HMPSTNMA	\$ 63.14	523	295.32%	\$ 33,047	3
LYVLTNMA	\$ 63.21	541	295.63%	\$ 34,222	3
PLMYTNMA	\$ 66.68	498	311.86%	\$ 33,175	3

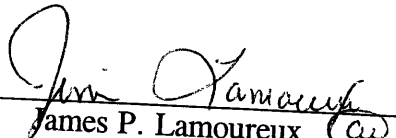
NASHVILLE, TENNESSEE

*In Re: Contested Case Proceeding to Establish Final Cost Based  
Rates for Interconnection and Unbundled Network Elements*

*Docket No: 97-01262*

CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that I have served a copy of the foregoing to the following counsel of record via U. S. First Class Mail, postage paid, this 14th day of April, 2000.

  
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